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10 RICHARD WILLIAMSON, Successor
11 Liquidating Trustee of Lipper Convertibles, LP,
12 Plaintiff/Judgment Creditor,
13 v.
14 EDWARD STRAFACI,
15 .
Defendant/Judgment Debtor.

Case No. 07 MC 390

**NOTICE OF MOTION FOR AN
ASSIGNMENT ORDER**

Date: July 14, 2008
Time: 10:30 a.m.
Ctrm: 1
Judge: Hon. Irma E. Gonzalez

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17 NOTICE IS HEREBY GIVEN that on July 14, 2008, at 10:30 a.m., or as soon thereafter as this
18 matter may be heard before the Honorable Irma E. Gonzalez in Courtroom 1 of the United States District
19 Court, located at 940 Front Street, San Diego, California 92101, Judgment Creditor RICHARD
20 WILLIAMSON, Successor Liquidating Trustee of Lipper Convertibles, L.P. (hereinafter "Creditor") will
21 and hereby does move this Court, under Federal Rules of Civil Procedure Rule 69 and California Code
22 of Civil Procedure §708.510, for an order against Judgment Debtor EDWARD STRAFACI (hereinafter
23 "Debtor"):

24 (1) Assigning any and all rights, title and interest of Debtor in any money due to him, or to
25 become due, from the class action lawsuit entitled Sheldon, Dubroff and Mervyn Klien,
26 et al. v. Wren Holdings, LLC, et al. under San Diego Superior Court Case Number
27 GIC879495, directly to Creditor until the amount remaining due on the \$89,828.416.00
28 judgment, plus all accrued interest and costs thereon, is paid in full.

(2) Directing Debtor to pay any and all money due, or to become due, under the assignment order, directly to Creditor until the amount remaining due on the \$89,828.416.00 judgment, plus all accrued interest and costs thereon, is paid in full.

PLEASE TAKE FURTHER NOTICE that this motion is made pursuant to a criminal restitution judgment entered by the United States District Court, Southern District of New York, which was registered in this Court, Debtor's refusal to voluntarily pay the judgment, Debtor's interest in the Sheldon, Dubroff and Mervyn Klien, et al. v. Wren Holdings, LLC, et al. class action case, Federal Rules of Civil Procedure Rule 69 and California Code of Civil Procedure §708.510, and on the grounds the judgment against Debtor is final and remains unsatisfied.

PLEASE TAKE FURTHER NOTICE that this motion is based on this Notice and Motion, the pleadings, records and files in his action, the accompanying Memorandum of Points and Authorities, Exhibits and the Declarations of Richard Williamson and Bryan D. Sampson, the proposed Order and upon such evidence as may be presented at the hearing on this motion.

Respectfully submitted,

DATED: May 23, 2008

SAMPSON & ASSOCIATES

By: /s/ Bryan D. Sampson
Attorneys for Judgment Creditor
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